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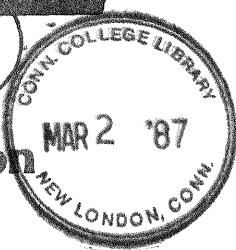
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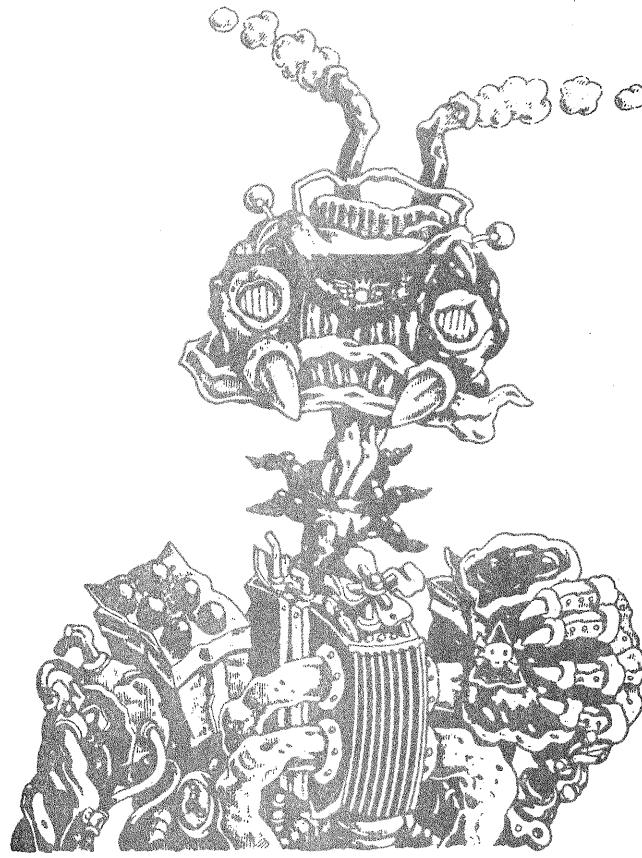
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ISIS MAKES PLEA THAT WE "DESIGN FOR RECYCLING"

In both their Fall, 1986 and their Winter, 1986-87 issues of Phoenix Quarterly, the Institute of Scrap Iron and Steel (ISIS) has reported on the frustrations and ironies that have grown between hazardous waste laws and the scrap metal processing industries. To personify the subject of their ire, ISIS has created the monster named "Nefarious". To quote ISIS:

WHY CREATE A MONSTER?



"Some manufacturers and fabricators add materials to their products which can be hazardous to the environment. As a result, it could be impossible to recycle metal products that contain such hazardous materials. That means more hazardous waste to dispose of, already a real problem for our environment.

"The best way to reduce the hazardous waste problem is to start at the very beginning. Think about recycling at the front end - DESIGN FOR RECYCLING.

"Why create a monster such as Nefarious, when recycled metals help the environment, contribute to the economy, and save energy. If companies that manufacture products would design in recyclability by designing out hazardous materials, it would increase recycling and conserve natural resources.

"The scrap industry's objective is to sensitize manufacturers to the environmental impact of their products in order to enhance the recycling of metallic discards. When companies design for recycling, the monster, Nefarious, is vulnerable. If they don't, the 'Super' in Superfund will be more than Nefarious."

The three federal laws from which have grown the present restrictions on hazardous wastes are: the Resource Conservation and Recovery Act of 1976 (RCRA) as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA); the Toxic Substances Control Act of 1976 (TSCA); and the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), also known as "Superfund." Under these laws, limits have been set to determine what levels of chemicals (organic and inorganic) constitute "hazardous waste" when measured in a material. These laws prescribe means to store, transport, treat, and dispose of the hazardous wastes. Transgressors of these laws face strict liability, joint and several liability, and no statute of limitations. In order to understand the consequences, one might consider a particular waste: used automobile batteries.

The used-up lead-acid batteries from automobiles, six years ago, were recycled at a rate of 90%. Today less than 60% are recycled, and the rate continues to drop. Processors are much more concerned with maintaining a clean bill of environmental health at their facilities and protecting themselves from liability. As ISIS points out, auto batteries are now regarded as more of a waste disposal problem than as a recyclable scrap. A common practice today is

to stuff used batteries in old auto hulks (sneaking them into a facility and making them someone else's headache.) ISIS reports that the current record is 47 batteries found in one hulk.

The Institute of Scrap Iron and Steel has published a list of 25 common, but potentially hazardous, materials that are now regarded with renewed caution by owners and operators of the shredders (which prepare scrap metal for the furnace):

MATERIAL	POTENTIAL PROBLEMS (based on fed. law)
Gas Tanks	Explosions; lead from gasoline and terneplate
Batteries	Lead, acid, or nickel-cadmium residues
Closed Containers	Explosions, chemical residues
Tanks	Explosions, chemical residues
Testing and Lab Equip.	Radioactivity; chemical residues; medical and human wastes
Hospital Equipment	
Vials and Bottles	
Gauges and Measuring Devices	Radioactivity
Compressed Gas Cylinders	Explosions, hazardous gasses
Turnings	Oil or chemical residues
Drums, Barrels, or other "Empty" Containers	Chemical residue
Wire/Cable (insulated or coated)	Asbestos, lead, or chemical residues
Pipe	Asbestos, lead, other coatings or internal residues
Transformers & Capacitors	PCB's, oil
Paint or Thinner	Explosions, lead, cadmium, or solvents
Cans and Buckets	
Metallic Sludges; Drosses	Chemical residues
Motor Blocks	Oils, solvents, or chemical residues
Demolition Scrap	Radioactivity, asbestos, lead
White Goods, Appliances	PCB's, cadmium, asbestos
Military/Government Scrap	Explosions, chemical residues
Slag and Pit Scrap	Chemical residues
Aircraft Material	Aluminum/lithium explosions; chemical residues
Auto or Rail Brakes/Drums	Asbestos
Waste Oil	"Free-flowing"; PCB residues
Leaded Scrap	Lead
Plated, Coated, or Painted Scrap	Cadmium, lead, zinc

There is no short-term solution to the problems we face at the waste-end of today's consumer society. One very sensible long-range solution offered by the Institute of Scrap Iron and Steel has applications to all components of our mixed municipal solid waste stream. Manufacturers and producers of products and product packaging should design into each product and package some consideration for its inevitable fate: discarded waste. Responsible design, recognizing the environmental and economic strain of waste disposal, is DESIGN FOR RECYCLING.

Part of Connecticut's plan for regional recycling of municipal solid waste calls for "waste reduction", that is, residential and commercial efforts to minimize their generation of useless waste materials. If what we discard has been designed so that it can be readily recycled, we are on the right track.

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